Sprint does not contend that it should simply be reimbursed for it's cost, however efficient or inefficient its operations may be. Sprint is at the leading edge of the use of technology and efficient operations. Sprint is a least cost provider for our service territories.

Customer Operations Expenses

As stated earlier, Sprint does not support the Commission's flawed regression methodology, and it believes that a direct reduction of total company marketing expenses for only the 4.4% Economics and Technology, Inc. factor is an acceptable method for calculating the marketing expense input.

In *ex parte* comments, Sprint suggested that a benchmark for a reasonable average customer services expense input for its non-rural companies was $1.91. This was calculated as a composite of Sprint's non-rural companies' Part 36 local distributions of account 6623 expenses divided by the total access lines for all Sprint non-rural companies. Sprint's benchmark input represents a 45% reduction of the booked expense amount. The synthesis' model input of $0.87, a 70.5% reduction from the booked expense amount, is unreasonably low when compared to Sprint's benchmark amount.

Note that in Appendix F, page F-4 to the FNPRM, total monthly customer services expense (account 6623) per line is approximately $2.95 ($4.03786 x 73%). After the regressions are run, the average of specifications for customer services expense is approximately $1.00, a reduction of $1.95. The application of the factor of 12.46% further reduces the input from $1.00 to approximately $0.87. In total, customer services expense is reduced from $2.95 to $0.87, a reduction of $2.08 or 70.5%. Sprint believes that such a percentage reduction is excessive.

As a reasonableness test, Sprint calculated a basic local service revenue requirement for its non-rural companies associated with the Part 36 investment categories of local switching, subscriber circuit equipment, and subscriber cable and wire facilities portion of investment, plant specific expenses, common support service expenses, and taxes. Investment and expense data was taken from 1998

ARMIS reports 43-01. The resulting basic local service revenue requirement was then compared to the total company revenue requirement. This comparison showed that 78.76% of Sprint non-rural total revenue requirement is attributable to subscriber plant (supported services). This benchmark suggests that an approximate reasonable reduction to expense would be in the range of 21% (100% - 78.76%). Contrasted with the Commission's proposed 70.5% reduction, the $0.87 input is clearly unreasonable.

Sprint obviously does not support the Commission's flawed regression methodology. Sprint believes that a direct reduction of total company specific expense is a superior method for calculating the customer operations expense inputs. Sprint proposes that the customer services expense input should be calculated as total company account 6623 (from ARMIS) times the percentage of local DEM to total DEM (from NECA data for Tier 1 companies), less a reduction to the result by a factor (comparable to 12.46% factor) designed only to exclude expenses for coin operations and collection. Only coin would need to be factored out, since deriving the input by applying a local DEM factor already reduces expenses for access billing, inter-exchange carrier office operation, and service order processing. Such a method is simpler and more straightforward that a regression methodology, and account and DEM data is available from publicly available sources. For example, using the same 1996 expense data as the Commission used for the synthesis model, the total company amount for account 6623 of $2.95 times the local DEM factor developed from NECA Tier 1 data for 1996 of 74.30%, yields a pre-adjusted input of $2.19. After application of a factor to exclude coin operations and collections, the adjusted input would be close to $2.00 Sprint believes the current results of the regression methodology, $0.87, grossly understates the amount of account 6623 applicable to basic local service. Conversely, Sprint's proposal would yield a more reasonable result and is more easily administered than the regression methodology.

Corporate Operations Expenses

Sprint calculated a total revenue requirement for its non-rural companies associated with the local switching, subscriber circuit equipment, and subscriber cable and wire facilities portion of investment, plant specific expenses, and taxes. Investment and expense data was taken from 1998 ARMIS reports 43-01. The resulting revenue requirement was then compared to the total company revenue requirement. This comparison showed that 79.73% of Sprint non-rural total revenue requirement is attributable to subscriber plant (supported services). This benchmark suggests that an approximate reasonable reduction to expense would be in the range of 20% (100% - 79.73%). In the case that the Commission's flawed regression methodology cannot be corrected, Sprint proposes that this methodology be used in its place. This calculation is included as Attachment 11.

CAPITAL COSTS

Method of Depreciation

Paragraph 231

At paragraph 231 of the FNPRM, the Commission requests comments on the method of depreciation for use in the calculation of high cost support. The Commission tentatively concludes that straight-line equal life group depreciation is the most appropriate method for calculating depreciation expenses. Sprint concurs with the Commission's conclusion that depreciation modeled for high cost support should be calculated using straight-line equal life depreciation.

Depreciation Lives and Future Net Salvage Percentages

Paragraph 234

In paragraph 234, the Commission seeks comments on the tentative conclusion that HAI's values represent the best forward-looking estimates of depreciation lives and net salvage percentages. In paragraph 233, the Commission concluded that "these values are based on a weighted average of the rates authorized for carriers that are required to submit rates to us, and that the values submitted by the HAI sponsors essentially reflect such a weighted average." This is further confirmed in the HAI Inputs Portfolio, which states the averages of projection lives and net salvage percentages are weighted based on total lines per operating company, and the lives and salvage values were determined in triennial reviews with each state PUC, the Commission and LEC.

The Commission has already recognized in *1998 Biennial Review -- Review of Depreciation Requirements for Incumbent Local Exchange Carriers*, CC Docket 98-137 (NPRM released October 14, 1998), the life range for digital switching should be expanded as "the retirement rates for digital switching will continue to increase." In that proceeding, the Commission has suggested that the lower end of the range for digital switching should be reduced to 13 years, which is more than 3 years shorter than the value currently in the HAI inputs. Sprint believes that this account will continue to be significantly impacted by technological obsolescence as more LECs replace their digital switches with packet switches over the next several years.

Sprint also questions the appropriateness that the HAI projection lives and future net salvage values have in assessing the economic life of the LECs' plant and equipment. The HAI default values for depreciation inputs have not changed since the HAI Model 3.1 was released in January 1997. As these inputs are based on triennial reviews, this data would most likely be from reviews prior to 1997, which would include parameters established in 1994 to 1996 triennial reviews. As this data is now at least three to five years old, it is difficult to consider it "economic" based on the rapid pace of technology today. Sprint recommends that the values for economic lives and future net salvage percentages be revisited. Furthermore, Sprint is of the opinion that the lives eventually prescribed by the Commission should be determined as a result of a study of forward-looking lives and not drawn from past lives approved by the Commission.

Beginning in 1995 (other LECs did so in the period from 1993 to 1996), Sprint adopted accounting principles for a competitive marketplace and discontinued applying SFAS 71 to its local telephone division. This move was prompted by changes in the regulatory framework and the convergence of competition in the telecommunication industry. The primary effects of this action included the increase of accumulated depreciation reserves, plant asset lives were shortened to reflect their economic lives and switch software costs which were previously expensed were capitalized and amortized over their estimated economic lives.

These write-offs and changes in financial reporting occurred during the same time period in which the triennial reviews that the HAI values are drawn . This would indicate that if the HAI values were indeed forward-looking, then the telecommunications industry would not have proceeded with the write-down of assets and the adoption of economic depreciation parameters. Sprint also asserts that these parameters are truly forward-looking and will not lead companies to over depreciate their telephone plant. Under price-cap regulation, there is no incentive for the LECs to over or under depreciate their telephone plant. Over depreciation will only dilute earnings, increasing capital costs, while under depreciation leads to recognizing a huge deficit on technologically obsolete equipment when it is finally retired.

Sprint is specifically recommending the adoption of the following economic lives and net salvage percentages. Sprint believes these are appropriate TELRIC based factors that are forward-looking and will recognize the appropriate level of technological obsolescence. The following table shows these proposed lives and salvage percentages as compared to the HAI default values:

Plant Type	HAI Economic life	Sprint Economic Life	HAI Net Salvage	Sprint Net Salvage
Digital Switching	16.17	11.0	2.97%	-3.0%
Digital Circuit Equipment	10.24	11.0	-1.69%	-1.0%
Poles	30.25	14.0	-89.98%	-43.0%
Aerial Cable, Metallic	20.61	15.0	-23.03%	-18.0%
Aerial Cable, Non-metallic	26.14	20.0	-17.53%	-20.0%
Underground Cable, Metallic	25.00	15.0	-18.26%	-12.0%
Underground Cable, Non-metallic	26.45	20.0	-14.58%	-14.0%
Buried Cable, Metallic	21.57	18.0	-8.39%	-9.0%
Buried Cable, Non-metallic	25.91	20.0	-8.58%	-10.0%
Conduit	56.19	39.7	-10.34%	-10.0%

Paragraph 235

In paragraph 235, the Commission draws an incorrect conclusion that there should be a match between the rate of depreciation booked annually by a LEC and the retirement rate of plant. The Commission also assumes that this difference has allowed the depreciation reserve to grow to a percentage greater than 50%. This illogical conclusion is offered as support for the conclusions drawn in paragraph 235 that "the prescribed lives are shorter than the engineering lives of these assets," and "this difference provides a buffer against technological change and competitive risk for the future."

In response to these conclusions, Sprint first addresses the difference between the retirement rate and the depreciation rates. The purpose of depreciation is not to match retirements, but instead to distribute, as an expense, the cost of an asset over its life. A telephone pole which experienced a life of 20 years, would not have any retirements booked until year 20, but it would have one-twentieth of its value (less net salvage) recorded as depreciation each of those 20 years. Obviously there is not a match between the retirement rate and the depreciation rate.

With regard to the assertion that this same difference between the depreciation rate and the retirement rate has allowed the LECs' reserve ratio to grow to a level greater than 50%, Sprint is not convinced this argument has substance. Sprint would like to point out that the industry's reserve level remained fairly level at about 20%, until the early 1980's. During this time, the reserve levels began to grow as a result of the Commission approving remaining life vintage group methodology and later, remaining life with equal life group methodology. These changes caused an increase in depreciation accruals/reserve levels as a result of attempting to recover reserve deficiencies that had existed for several years. Additionally, since the late 1980's the composite depreciation rate for the LECs has actually declined as the reserve level grew, due to the inclusion of the reserve percentage in the remaining life depreciation rate calculation. For these reasons, Sprint cannot conclude that the Commission's prescribed ranges provide a buffer against technological change and competitive risk for the future. Sprint does not believe that the Commission's ranges are appropriate to determine depreciation rates for the model.

In summary, Sprint points out that, while the Commission has tentatively selected values that are "generally at the lower end of the range," the values themselves are based on Commission approved filings. Therefore, it would seem reasonable that the averages of the same values would fall within the ranges prescribed by the Commission. Sprint is not convinced that this sort of circular reasoning validates the appropriateness of the HAI values for use in developing forward-looking costs.

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CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 23rd day of July 1999, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Corporation," In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Forward-Looking Mechanism For High Cost Support for Non-Rural LECs, CC Docket No. 97-160, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.

Joyce Walker

Joyce Y. Walker